

EXCEPTION

EXCEPTION 99
BellSouth Florida OSS Testing Evaluation

Date: August 23, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Electronic Data Interchange (EDI) interface. (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the Competitive Local Exchange Carrier (CLEC) via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

BellSouth is expected to provide fully mechanized Firm Order Confirmations (FOCs), Clarification, or Error responses for a minimum of 99% of acknowledged PONs.² Planned flow-through drop-out errors are excluded from the calculation.

Issue:

As part of the POP Volume Performance Test KPMG Consulting submitted orders to BellSouth via EDI on August 18, 2001.

The following are the response results on mechanized orders using the EDI interface, excluding planned flow-through drop-out orders.

| ACK | FOC, ERR, or CLR | No Response | Response Percentage |
|------|------------------|-------------|---------------------|
| 8743 | 7989 | 754 | 91.4% |

KPMG Consulting has not received a fully mechanized FOC, rejection, or clarification from BellSouth for the following orders³:

¹ BellSouth Business Rules for Local Ordering, Issue 90, section 2.9.3.

² KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BLS guidelines.

³ A representative sample of the 754 PONs has been provided.

EXCEPTION 99
BellSouth Florida OSS Testing Evaluation

| PON | Ver | CC |
|------------------|-----|------|
| 0021211CEJYY0256 | 00 | 9991 |
| 0021211CEJYY0482 | 00 | 9991 |
| 0200211CENYY0001 | 00 | 9991 |
| 0200211CENYY0002 | 00 | 9991 |
| 0200511CEJYY0015 | 00 | 9991 |
| 0200511CEJYY0026 | 00 | 9991 |
| 0200511CEJYY0049 | 00 | 9991 |
| 0200511CEJYY0074 | 00 | 9991 |
| 0200511CEJYY0140 | 00 | 9991 |
| 0200511CEJYY0194 | 00 | 9991 |
| 0200511CEJYY0214 | 00 | 9991 |
| 0200511CEJYY0240 | 00 | 9991 |
| 0200511CEJYY0280 | 00 | 9991 |
| 0200511CEJYY0370 | 00 | 9991 |
| 0200511CEJYY0502 | 00 | 9991 |
| 0700221CEHYY0021 | 00 | 9991 |
| 0700221CEHYY0097 | 00 | 9991 |
| 0700221CEHYY0215 | 00 | 9991 |
| 0720621CEHYY0018 | 00 | 9991 |
| 0720621CEHYY0033 | 00 | 9991 |
| 0720621CEHYY0061 | 00 | 9991 |

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BellSouth Florida OSS Testing Evaluation

| PON | Ver | CC |
|------------------|-----|------|
| 0720621CEHYY0081 | 00 | 9991 |
| 0720621CEHYY0141 | 00 | 9991 |
| 0720621CEHYY0153 | 00 | 9991 |
| 0720621CEHYY0168 | 00 | 9991 |
| 0720621CEHYY0188 | 00 | 9991 |
| 0720621CEHYY0204 | 00 | 9991 |
| 0760121CEHYY0057 | 00 | 9991 |
| 0760121CEHYY0148 | 00 | 9991 |
| 0760121CEHYY0188 | 00 | 9991 |

Impact:

The absence of fully mechanized BellSouth confirmations and errors can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 99



Florida OSS Test
Exception #99

Date: August 28, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Electronic Data Interchange (EDI) interface. (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the Competitive Local Exchange Carrier (CLEC) via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

BellSouth is expected to provide fully mechanized Firm Order Confirmations (FOCs), Clarification, or Error responses for a minimum of 99% of acknowledged PONs.² Planned flow-through drop-out errors are excluded from the calculation.

Issue:

As part of the POP Volume Performance Test KPMG Consulting submitted orders to BellSouth via EDI on August 18, 2001.

The following are the response results on mechanized orders using the EDI interface, excluding planned flow-through drop-out orders.

| ACK | FOC, ERR, or CLR | No Response | Response Percentage |
|------|------------------|-------------|---------------------|
| 8743 | 7989 | 754 | 91.4% |

¹ BellSouth Business Rules for Local Ordering, Issue 90, section 2.9.3.

² KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BLS guidelines.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 99

KPMG Consulting has not received a fully mechanized FOC, rejection, or clarification from BellSouth for the following orders³:

| PON | Ver | CC |
|------------------|-----|------|
| 0021211CEJYY0256 | 00 | 9991 |
| 0021211CEJYY0482 | 00 | 9991 |
| 0200211CENYY0001 | 00 | 9991 |
| 0200211CENYY0002 | 00 | 9991 |
| 0200511CEJYY0015 | 00 | 9991 |
| 0200511CEJYY0026 | 00 | 9991 |
| 0200511CEJYY0049 | 00 | 9991 |
| 0200511CEJYY0074 | 00 | 9991 |
| 0200511CEJYY0140 | 00 | 9991 |
| 0200511CEJYY0194 | 00 | 9991 |
| 0200511CEJYY0214 | 00 | 9991 |
| 0200511CEJYY0240 | 00 | 9991 |
| 0200511CEJYY0280 | 00 | 9991 |
| 0200511CEJYY0370 | 00 | 9991 |
| 0200511CEJYY0502 | 00 | 9991 |
| 0700221CEHYY0021 | 00 | 9991 |
| 0700221CEHYY0097 | 00 | 9991 |
| 0700221CEHYY0215 | 00 | 9991 |
| 0720621CEHYY0018 | 00 | 9991 |

³ A representative sample of the 742 PONs has been provided.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 99

| | | |
|------------------|----|------|
| 0720621CEHYY0033 | 00 | 9991 |
| 0720621CEHYY0061 | 00 | 9991 |
| 0720621CEHYY0081 | 00 | 9991 |
| 0720621CEHYY0141 | 00 | 9991 |
| 0720621CEHYY0153 | 00 | 9991 |
| 0720621CEHYY0168 | 00 | 9991 |
| 0720621CEHYY0188 | 00 | 9991 |
| 0720621CEHYY0204 | 00 | 9991 |
| 0760121CEHYY0057 | 00 | 9991 |
| 0760121CEHYY0148 | 00 | 9991 |
| 0760121CEHYY0188 | 00 | 9991 |

Impact:

The absence of fully mechanized BellSouth confirmations and errors can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

BellSouth's Response:

BellSouth's findings are in the following charts for the Volume Test conducted on August 16, 2001

| PON | Ver | CC | BellSouth Response |
|------------------|-----|------|---|
| 0021211CEJYY0256 | 00 | 9991 | KPMG Input Error. TNS field incorrect. Order fell out for Manual Handling. |
| 0021211CEJYY0482 | 00 | 9991 | KPMG Input Error. TNS field incorrect. Order fell out for manual handling. |
| 0200211CENYY0001 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 99

| | | | |
|------------------|----|------|---|
| 0200211CENYY0002 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0015 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0026 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0049 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0074 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0140 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0194 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0214 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0240 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0280 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0370 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0200511CEJYY0502 | 00 | 9991 | Defect opened for Due Date calculation. BLS fix targeted for 9/8. Order fell out for Manual Handling. |
| 0700221CEHY0021 | 00 | 9991 | Processing error. A transient problem in DB2 prevented SOER from accessing the CABS Rate Database. Order fell out for Manual Handling |

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 99

| | | | |
|------------------|----|------|---|
| 0700221CEHYY0097 | 00 | 9991 | Processing error. A transient problem in DB2 prevented SOER from accessing the CABS Rate Database. Order fell out for Manual Handling. |
| 0700221CEHYY0215 | 00 | 9991 | Processing error. Lesog failed to connect to a backend system for a maximum number of retries. All occurrences of this happened at 19:00 EDT. Order fell out for Manual Handling. |
| 0720621CEHYY0018 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0033 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0061 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0081 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0141 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0153 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0168 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0188 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |
| 0720621CEHYY0204 | 00 | 9991 | Known Defect was opened 7/02/01 for a PSIMS issue in LESOG. Fix scheduled for implementation 9/29/01. Order fell out for Manual Handling. |

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 99

| | | | |
|------------------|----|------|---|
| 0760121CEHYY0057 | 00 | 9991 | KPMG Input Error. Invalid Cable ID. Order fell out for Manual Handling. |
| 0760121CEHYY0148 | 00 | 9991 | KPMG Input Error. Invalid Cable ID. Order fell out for Manual Handling. |
| 0760121CEHYY0188 | 00 | 9991 | Processing error. LESOG failed to connect to a backend system for a maximum number of retries. All occurrences of this happened at 19:00 EDT. Order fell out for Manual Handling. |

Of the total 30 PONs listed, BellSouth found that all PONs fell out for Manual Handling. In summary:

- 13 related to new Defect; fix targeted 9/8/01 implementation to address calculated due date issue.
- 9 related to existing Defect; fix scheduled for 9/29/01 implementation to address PSIMS issue in LESOG.
- 2 BellSouth transient system problems
- 2 BellSouth unavailability of backend system
- 4 KPMG data problems

KPMG should refer to Measure 0 – 11 on FOC and Reject Response Completeness for the Approved Standard.

EXCEPTION

EXCEPTION 100

BellSouth Florida OSS Testing Evaluation

Date: August 24, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1). This exception was originally issued as Observation 101.

Exception:

KPMG Consulting has not received timely mechanized Unbundled Network Elements – Loop (UNE-L) Firm Order Confirmations (FOCs) from BellSouth’s Electronic Data Interchange (EDI) interface. (TVV1)

Background: According to Ordering O-9 of the Service Quality Measurement Plan¹, BellSouth should return a mechanized UNE-Loop FOC to CLECs within three hours of receipt of the Local Service Request (LSR).

Issue:

During production testing of the EDI interface, KPMG Consulting received a number of mechanized UNE-Loop FOCs in greater than the three-hour time frame.

The following are the results that KPMG Consulting received as of July 11, 2001 on mechanized UNE-Loop FOC timeliness.

| | < 3 hrs | >=3 & <24 hrs | >=24 & <36 hrs | >=36 & <48 hrs | >=48 & <72 hrs | >72 hrs | Total |
|-----------------------------------|------------|------------------|-------------------|-------------------|-------------------|------------|-------|
| Number of Transactions | 117 | 5 | 0 | 0 | 1 | 1 | 124 |
| Percent | 94% | 4% | 0% | 0% | 1% | 1% | 100% |

¹ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved by Florida PSC June 1, 2001

EXCEPTION 100
BellSouth Florida OSS Testing Evaluation

Following is a list of PONs that did not receive a UNE-Loop FOC within three hours:

| Pon | Ver | CC | LSR Sent | FOC Received |
|------------------|-----|------|-------------------|-------------------|
| 080012FPEH001005 | 01 | 9993 | 06/22/01 08:19 AM | 06/26/01 10:23 AM |
| 071061FPEI001008 | 01 | 7125 | 06/29/01 09:55 AM | 07/02/01 09:42 AM |
| 072073FPEH100004 | 00 | 9990 | 04/03/01 12:43 PM | 04/04/01 12:07 PM |
| 072011FPEH100016 | 00 | 9990 | 06/19/01 05:05 PM | 06/19/01 08:36 PM |
| 072011FPEH100017 | 00 | 9990 | 06/19/01 05:05 PM | 06/19/01 08:36 PM |
| 072051FPEH100001 | 00 | 9990 | 06/19/01 05:09 PM | 06/19/01 08:36 PM |
| 079011FPEH001002 | 00 | 9993 | 06/20/01 04:27 PM | 06/20/01 07:46 PM |

Impact:

The receipt of timely UNE-Loop FOCs is a critical factor in the CLEC's ability to process service requests and to deliver service to customers in a timely manner. Delays in the return of FOCs could have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 100



Florida OSS Test
Exception #100

Date: August 29, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1). This exception was originally issued as Observation 101.

Exception:

KPMG Consulting has not received timely mechanized Unbundled Network Elements – Loop (UNE-L) Firm Order Confirmations (FOCs) from BellSouth's Electronic Data Interchange (EDI) interface. (TVV1)

Background: According to Ordering O-9 of the Service Quality Measurement Plan¹, BellSouth should return a mechanized UNE-Loop FOC to CLECs within three hours of receipt of the Local Service Request (LSR).

Issue:

During production testing of the EDI interface, KPMG Consulting received a number of mechanized UNE-Loop FOCs in greater than the three-hour time frame.

The following are the results that KPMG Consulting received as of July 11, 2001 on mechanized UNE-Loop FOC timeliness.

| | < 3 hrs | >=3 & <24 hrs | >=24 & <36 hrs | >=36 & <48 hrs | >=48 & <72 hrs | >72 hrs | Total |
|-----------------------------------|------------|------------------|-------------------|-------------------|-------------------|------------|-------|
| Number of Transactions | 117 | 5 | 0 | 0 | 1 | 1 | 124 |
| Percent | 94% | 4% | 0% | 0% | 1% | 1% | 100% |

¹ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved by Florida PSC June 1, 2001

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 100

Following is a list of PONs that did not receive a UNE-Loop FOC within three hours:

| Pon | Ver | CC | LSR Sent | FOC Received | BellSouth Findings |
|------------------|-----|------|----------------------|----------------------|---|
| 080012FPEH001005 | 01 | 9993 | 06/22/01 08:19 AM | 06/26/01 10:23 AM | An FOC document was not generated due to an EDI defect. When multiple files came to the Mercator translator at virtually the same time, Mercator would assign the same Thread ID to each file. Once one of the files was processed, the other file with the same Thread ID was dropped as that Thread ID was marked as complete. This was a Mercator software defect; the fix was developed by the parent company, sent to the EDI group, and implemented the evening of 7/19/01. The "FOC Received" date/timestamp was actually a Status that was sent to KPMG. |
| 071061FPEI001008 | 01 | 7125 | 06/29/01 09:55 AM | 07/02/01 09:42 AM | This was a partially mechanized LNP order. PON fell for manual handling due to an address validation issue. |
| 072073FPEH100004 | 00 | 9990 | 04/03/01 12:43 PM | 04/04/01 12:07 PM | This was a partially mechanized order. PON fell for manual handling due to invalid OCN data for the class of service and USOC submitted. |
| 072011FPEH100016 | 00 | 9990 | 06/19/01 05:05 PM | 06/19/01 08:36 PM | Response was delayed due to a problem with the application that calculates due dates. This was corrected on 8/10/01. |
| 072011FPEH100017 | 00 | 9990 | 06/19/01 05:05 PM | 06/19/01 08:36 PM | Response was delayed due to a problem with the application that calculates due dates. This was corrected on 8/10/01. |
| 072051FPEH100001 | 00 | 9990 | 06/19/01 05:09 PM | 06/19/01 08:36 PM | Response was delayed due to a problem with the application that calculates due dates. This was corrected on 8/10/01. |
| 079011FPEH001002 | 00 | 9993 | 06/20/01 04:27 PM | 06/20/01 07:46 PM | Response was delayed due to a problem with the application that calculates due dates. This was corrected on 8/10/01. |

Impact:

The receipt of timely UNE-Loop FOCs is a critical factor in the CLEC's ability to process service requests and to deliver service to customers in a timely manner. Delays in the return of FOCs could have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 100

BellSouth's Response:

BellSouth Findings for the individual PONs have been incorporated in the table above.
In summary:

- 1 PON was delayed due to an EDI defect that was fixed on 7/19/01.
- 2 PONs fell for manual handling and should not be included in this exception.
- 4 PONs were delayed due to due date calculation problem fixed on 8/10/01.